

1 **FRONTIER LAW CENTER**

2 Robert L. Starr (183052)

3 robert@frontierlawcenter.com

4 Karo G. Karapetyan (318101)

5 karo@frontierlawcenter.com

6 Manny Starr (319778)

7 manny@frontierlawcenter.com

8 23901 Calabasas Road, Suite 2074

9 Calabasas, California 91302

10 Telephone: (818) 914-3433

11 Facsimile: (818) 914-3433

12 **POMERANTZ LLP**

13 Jordan L. Lurie (130013)

14 jllurie@pomlaw.com

15 Ari Y. Basser (272618)

16 abasser@pomlaw.com

17 1100 Glendon Avenue, 15th Floor

18 Los Angeles, CA 90024

19 Telephone: (310) 432-8492

20 Facsimile: (310) 861-8591

21 Attorneys for Plaintiff Gor Gevorkyan

22 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

23 Gor Gevorkyan on behalf of himself and all  
24 others similarly situated,

25 Plaintiff,

26 vs.

27 Bitmain, Inc., Bitmain Technologies, Ltd.  
28 and DOES 1 to 10,

Defendants.

Case Number: 3:18-cv-07004-JD

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER EXTENDING  
TIME TO CONDUCT  
JURISDICTIONAL DISCOVERY AND  
CONTINUING JURISDICTIONAL  
BRIEFING SCHEDULE**

1 Plaintiff Gor Gevorkian and Defendant Bitmain Technologies, Ltd. hereby stipulate and  
2 agree as follows:

3 **WHEREAS**, on December 19, 2019, the Court granted leave for Plaintiff to conduct  
4 jurisdictional discovery on Defendant for a period of 120 days (ECF No. 44);

5 **WHEREAS**, due to travel restrictions related to the COVID-19 pandemic, the Parties  
6 stipulated to allow Plaintiff until July 22, 2021 to take a deposition of a Bitmain witness who is  
7 knowledgeable regarding the facts set forth in the Declarations of Luyao Liu (ECF No. 72); and  
8 the Court approved the Parties' Stipulation (ECF No. 73);

9 **WHEREAS**, the Court also ordered that Plaintiff could seek additional leave to further  
10 extend the deadline to conduct the deposition in the event travel restrictions would not permit a  
11 deposition by July 22, 2021 (ECF No. 73);

12 **WHEREAS**, the current travel restrictions are still such that a Bitmain's witness would  
13 be required to quarantine for 14 days upon re-entry into mainland China if the witness were  
14 required to leave mainland China in order to participate in the aforementioned deposition;

15 **WHEREAS**, recent changes in travel restrictions may now allow entry of certain  
16 foreign nationals into the Republic of Korea, subject to certain conditions and government  
17 approval;

18 **WHEREAS**, Bitmain is seeking to obtain the necessary approvals from the authorities  
19 of the Republic of Korea to allow a Bitmain witness, Yonggang Sun, to be deposed on August  
20 4, 2021, at the office of O'Melveny & Myers LLP in Seoul, South Korea;

21 **THEREFORE, THE PARTIES HAVE MET AND CONFERRED AND AGREED  
22 THAT:**

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25 1. The time for Plaintiff to depose a Bitmain witness should be extended by thirty-five  
26 (35) days until August 27, 2021;

27 2. The parties will conduct the deposition in Seoul, Republic of Korea, provided that  
28 they obtain the approval of the relevant local authorities;

3. The deadline to file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant shall be 30 days after the date that Plaintiff takes this deposition.

**NOW, THEREFORE**, the undersigned Parties hereby stipulate and agree, subject to Court approval, that:

1. The time for Plaintiff to depose a Bitmain witness shall be extended by thirty-five (35) days until August 27, 2021;
2. The parties shall conduct the deposition in Seoul, Republic of Korea, provided that they obtain the approval of the relevant local authorities;
3. If Plaintiff is unable to take the deposition by August 27, 2021, because of circumstances beyond his control, Plaintiff may seek additional leave of Court to further extend the deadline to conduct the deposition;
4. The Parties shall file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant within 30 days after the date that Plaintiff takes this deposition.

## IT IS SO STIPULATED

Dated: July 7, 2021

/s/ Manny Starr  
Robert Starr (183052)  
Karo G. Karapetyan (318101)  
Manny Starr (319778)  
FRONTIER LAW CENTER  
23901 Calabasas Rd, Suite 2074  
Calabasas, CA 91302  
Telephone: (818) 914-3433  
Facsimile: (818) 914-3433  
E-Mail: robert@frontierlawcenter.com  
karo@frontierlawcenter.com  
manny@frontierlawcenter.com

Jordan L. Lurie (130013)  
Ari Y. Basser (272618)  
POMERANTZ LLP  
1100 Glendon Avenue, 15th Floor  
Los Angeles, CA 90024  
Telephone: 310-405-7190

1 Facsimile: 917-463-1044  
2 E-mail: jllurie@pomlaw.com  
abasser@pomlaw.com

3 Christopher Marlborough (298219)  
4 THE MARLBOROUGH LAW FIRM, P.C.  
445 Broad Hollow Road, Suite 400  
5 Melville, NY 11747  
6 Telephone: (212) 991-8960  
Facsimile: (212) 991-8952  
7 E-Mail: chris@marlboroughlawfirm.com

8 Attorneys for Plaintiff

9  
10 Dated: July 7, 2021

11 /s/ Jason A. Orr  
12 Carlos M. Lazatin  
13 William K. Pao  
14 Jason A. Orr  
15 O'MELVENY & MYERS LLP  
16 400 South Hope Street  
17 18th Floor  
18 Los Angeles, CA 90071  
19 Telephone: (213) 430-6000  
Facsimile: (213) 430-6407  
Email: clazatin@omm.com  
Email: wpao@omm.com  
Email: jorr@omm.com

20 Attorneys for Defendant  
21 Bitmain Technologies, Ltd.

22 **ECF CERTIFICATION**

23 Pursuant to Civil Local Rule 5-1, I, Manny Starr, hereby attest that concurrence in the  
24 filing of this document has been obtained from all signatories.

25 DATED: July 7, 2021

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27 By: /s/ Manny Starr  
Manny Starr

1 **[PROPOSED] ORDER**  
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4 The Court, having considered the Joint Stipulation submitted by the Parties, and good  
5 cause appearing, orders as follows:  
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1. The time for Plaintiff to depose a Bitmain witness shall be extended by thirty-five (35) days until August 27, 2021;
2. The parties shall conduct the deposition in Seoul, Republic of Korea, provided that they obtain the approval of the relevant local authorities;
3. If Plaintiff is unable to take the deposition by August 27, 2021, because of circumstances beyond his control, Plaintiff may seek additional leave of Court to further extend the deadline to conduct the deposition;
4. The Parties shall file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant within 30 days after the date that Plaintiff takes the aforementioned deposition(s).

15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16 DATED: 7/14/2021

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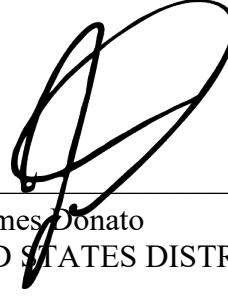
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Hon. James Donato  
UNITED STATES DISTRICT JUDGE